

EXHIBIT B

1 IN THE UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3
4 SPENCER MEYER, individually
5 and on behalf of those
6 similarly situated,

7 Plaintiffs,

8 vs.

No. 1:15 Civ. 9796 (JSR)

9 TRAVIS KALANICK,

10 Defendant.

11 /

12 CONFIDENTIAL PURSUANT TO THE PROTECTIVE ORDER

13 DEPOSITION OF JOSEPH SULLIVAN

14 SAN FRANCISCO, CALIFORNIA

15 THURSDAY, JUNE 23, 2016

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22 BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR

23 CSR LICENSE NO. 9830

24 JOB NO. 504146

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10 Defendant.

11 _____/

12
13 Deposition of Joseph Sullivan, taken on
14 behalf of the Plaintiff, at Gibson, Dunn &
15 Crutcher, LLP, 555 Mission Street, 30th Floor,
16 San Francisco, California, Pursuant to Notice,
17 before me, ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR,
18 CLR ~ CSR License No. 9830.
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1 A P P E A R A N C E S:

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4 ON BEHALF OF THE PLAINTIFF:

5 MCKOOL SMITH, P.C.

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11
12 ON BEHALF OF UBER TECHNOLOGIES:

13 GIBSON DUNN & CRUTCHER, LLP

14 By: NICOLA T. HANNA, Esq.

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20
21 ALSO PRESENT: Martin White, Uber

22 Angela Padilla, Uber

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1 sometimes we don't learn about it until someone files
2 a lawsuit. And so, as a result of that, sometimes we
3 do investigations related to people who are involved
4 in litigation.

5 And it's in that context that I -- I think I
6 would say "yes" to your question, because we're trying
7 to figure out what actually happened in the vehicle.
8 Is this a safe -- is this driver someone who should be
9 allowed to continue to drive? Is this passenger
10 someone who should continue to be allowed to press a
11 button and get a ride?

12 Other than that, I don't think that we have
13 at Uber.

14 Q Okay. And do you have some familiarity, as
15 we sit here today, with the investigation that Ergo
16 undertook with respect to Mr. Meyer?

17 A I read the report at the time it came in. I
18 have not gone back and looked at it since then.

19 Q Do you have an understanding of how Ergo went
20 about obtaining the information that was contained in
21 its report to you?

22 A I don't.

23 Q Have you attempted to figure that out as you
24 sit -- prior to today, as we sit here today?

25 A No.